

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

HENRY SALAZAR,

Plaintiff,

v.

C.A. No. 1:18-cv-00495-WES-PAS

SELENE FINANCE, LP; U.S. BANK
NATIONAL ASSOCIATION AS LEGAL TITLE
TRUSTEE FOR BCAT 2016-18TT; and PEDRO
TAVERAS,

Defendants.

**SELENE FINANCE LP AND U.S. BANK, AS TRUSTEE'S MOTION TO EXTEND
DEADLINE TO FILE REPLY MEMORANDUM**

Pursuant to Fed. R. Civ. P. 6(b), Defendants Selene Finance LP and U.S. Bank National Association as Legal Title Trustee for BCAT 2016-18TT (“Defendants”) request a two-week extension of time to file a reply memorandum in support of the Defendants’ Motion to Dismiss.

The Defendants filed their Motion to Dismiss on October 10, 2019. (ECF No. 35.) Plaintiff Henry Salazar (“Plaintiff”) filed a Motion to Extend the deadline to respond to November 25, 2019, which the Court granted by order dated October 23, 2019. The Court conditionally dismissed the case after Plaintiff failed to file an opposition by November 25, 2019 and provided Plaintiff up to December 16, 2019 to file an opposition.

Plaintiff filed an opposition to the Motion to Dismiss on December 16, 2019. (ECF No. 37). Plaintiff’s opposition is 53 pages long, and there are issues he raises that warrant a reply from Defendants. L.R. D.R.I. 7(a)(4) requires the submission of reply memorandum within 7 days of Plaintiff’s opposition. Given the complexity of issues to brief on reply, the Defendants request an additional 2 weeks, or up to and including January 6, 2020, to submit a reply

memorandum. The extended time will not prejudice the Plaintiff and should not otherwise delay adjudication of this matter.

WHEREFORE, Selene Finance LP and U.S. Bank National Association, not in its individual capacity , but solely as Legal Title Trustee for BCAT 2016-18TT respectfully request a two-week extension of their deadline to file a reply in support of their motion to dismiss Plaintiff's complaint.

Respectfully submitted,

SELENE FINANCE LP; AND U.S. BANK NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY, BUT SOLELY AS LEGAL TITLE TRUSTEE FOR BCAT 2016-18TT,

By Their Attorneys,

/s/ Samuel C. Bodurtha

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Dated: December 23, 2019

CERTIFICATE OF SERVICE

I, Samuel C. Bodurtha, hereby certify that the documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on December 23, 2019.

/s/ Samuel C. Bodurtha

Samuel C. Bodurtha